

PREET BHARARA

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Southern District of New York

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:	:	Bankr. Case No. 09-10156 (ALG)
	:	
TRONOX INCORPORATED, <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors.	:	
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TRONOX INCORPORATED, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	Adversary Proceeding
	:	No. 09-01198 (ALG)
- against -	:	
	:	
ANADARKO PETROLEUM CORPORATION	:	
and KERR-MCGEE CORPORATION,	:	
	:	
Defendants.	:	
-----	:	
THE UNITED STATES OF AMERICA,	:	
	:	
Plaintiff-Intervenor,	:	CERTIFICATION OF
	:	JOSEPH A. PANTOJA
	:	PURSUANT TO
- against -	:	<u>FED. R. CIV. P. 26(c)</u>
	:	
TRONOX, INC., <i>et al.</i> ,	:	
	:	
Defendants.	:	
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JOSEPH A. PANTOJA, pursuant to 28 U.S.C. § 1746, declares the following
under penalty of perjury:

1. I am an Assistant United States Attorney in the office of Preet Bharara, United States Attorney for the Southern District of New York, attorney for the Plaintiff-Intervenor United States of America (the “Government”) in the above-captioned adversary proceeding. I have been assigned to prosecute this matter and am familiar with the proceedings herein. I make this certification in support of the Government’s motion for a protective order.

2. As set forth in the accompanying Declaration of Joseph A. Pantoja, dated December 15, 2010, the Government has in good faith conferred with defendant Kerr-McGee and defendant Anadarko Petroleum Corporation (the “Defendants”) in an effort to resolve the Defendants’ motion to compel discovery from the Government without court action.. However, those discussions did not resolve all of the issues in dispute, including those issues underlying Defendants’ motion for a protective order.

Dated: December 15, 2010
New York, New York

/s/ Joseph A. Pantoja
JOSEPH A. PANTOJA